

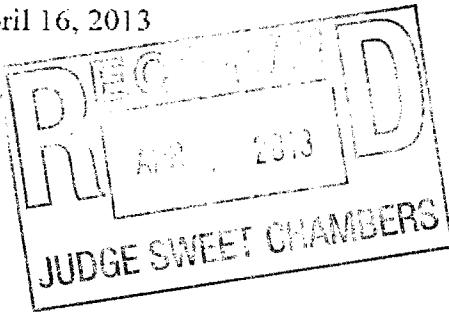
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Hon. Robert W. Sweet
United States District Court #:
Southern District of New York
Courtroom 18-C
500 Pearl Street
New York, New York 10007

April 16, 2013



Re: *Kings Road Holdings VIII Ltd. et al. v. Moore et al.*, 12-cv-08657 (RWS)

Dear Judge Sweet:

We represent defendants Moore Investments, Inc. ("Moore Investments"), Paul Moore, MBC Global, LLC, and Red Canyon Advisors, LLC in the above-referenced action. We filed a notice of appearance on behalf of Paul Moore on April 15, 2013, and we were retained by the remaining defendants in connection with this matter late this afternoon. According to the docket in the above referenced action, Moore Investments' time to answer, move or otherwise respond to the complaint expires today. We write to respectfully request that this Court grant Moore Investments a forty-five (45) day extension of time in order to answer, move or otherwise respond to the complaint in the above referenced action. Moore Investments has not requested any previous extensions of time to answer, move or otherwise respond to the complaint.

Pursuant to Your Honor's Individual Rules of Practice, prior to seeking this request, we attempted to reach out to Plaintiffs' counsel to seek consent for the requested forty-five (45) day extension of time. Given the lateness of the hour (approximately 5:30 pm), we were unable to reach him even though we attempted to reach him both by telephone and email. In both our voicemail and email to plaintiffs' counsel, we indicated that in the absence of hearing a response from him we would send this letter request because otherwise Moore Investments would be required to answer the complaint today.

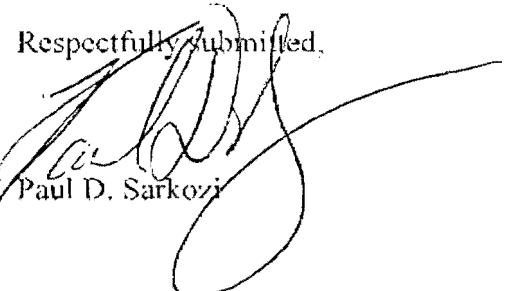
We request this extension so that Moore Investments can properly prepare a response to the complaint. In making this application, defendants wish to make clear that they expressly reserve all rights, including but not limited to the right to assert objections on the basis of lack of personal jurisdiction, improper venue and improper service.

*So ordered
Sweet 4/17/13*

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Respectfully submitted,



Paul D. Sarkozy

cc: W. Murley Palmer, Esq. (via email)
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